

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

**DECLARATION OF TENY GERAGOS KRISHNASWAMY**

I, Teny Rose Geragos Krishnaswamy, declare as follows:

1. I am a partner at Agnifilo Intrater LLP, counsel for Sean Combs. I am licensed and in good standing to practice law in the States of New York and California and I am also admitted to the United States District Court for the Southern District of New York.

2. The declaration is based on my personal knowledge of the facts stated herein, and is submitted in support of Mr. Combs's Motion To Exclude Rule 413 and 404(b) Evidence.

3. Attached hereto as **Exhibit A** is the government's March 7, 2025 Rule 413/404(b) notice.

4. Attached hereto as **Exhibit B** is the government's March 17, 2025 disclosure of the names of the anonymized victims and witnesses in Exhibit A.

5. Attached hereto as **Exhibit C** is a photograph of a newspaper clipping, produced by the government to the defense as USAO\_01164701.

6. Attached hereto as **Exhibit D** is a true and correct copy [REDACTED]

[REDACTED]

[REDACTED]

7. Attached hereto as **Exhibit E** is a true and correct copy of [REDACTED]

8. Attached hereto as **Exhibit F** is a true and correct copy of [REDACTED]

9. Attached hereto as **Exhibit G** is a true and correct copy of [REDACTED]

10. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 19, 2025  
New York, NY

/s/ Teny Geragos  
Teny Rose Geragos, Esq.